

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:		CASE NO.: 12-07143-ESL
MARIA DEL PILAR RODRIGUEZ LOPEZ		CHAPTER-13-
DEBTOR(S)		

**MOTION UNDER SECTION 1329 AND TO
AMEND ORDER UNDER RULE 9023**

TO THE HONORABLE COURT:

COMES NOW DEBTOR through the undersigned attorney and to this Honorable Court respectfully states and prays as follows:

1. Debtor(s) filed a voluntary petition (chapter 13) which payment plan was confirmed.
2. Debtor(s) is/are hereby requesting to be allowed to modify his/her/their confirmed payment plan to PROVIDE FUNDS FOR POST PETITION ARREARS WITH REO PROPERTIES/OPERATING PARTNERS.
3. Debtor(s) request to be allowed to modify his/he/their confirmed payment plan.
4. With the modified payment plan unsecured creditors will still receive more than they would under a Chapter 7 Liquidation.

WHEREFORE it is respectfully requested to this Honorable Court that the request for modification of the payment plan be accepted and that Debtors be allowed to continue making his payments as stated in the modified payment plan and the Order of Confirmation be altered in such fashion as to allow the same and any further relief as is just.

NOTICE IS HEREBY GIVEN TO PARTIES IN INTEREST THAT THEY HAVE TWENTYONE (21) DAYS TO OBJECT THE PROPOSED MODIFICATION OF THE CHAPTER 13 PLAN AND REQUEST A HEARING. ABSENT GOOD CAUSE UNTIMELY OBJECTIONS SHALL BE DENIED.

CERTIFICATE OF SERVICE: I hereby certify that the foregoing motion has been filed with the Clerk of the court using the CM/ECF system that will electronically notify parties in interest and to Chapter 13, Trustee Alejandro Oliveras, US Trustee Office. Non CM/ECF participants that are interested parties will be notified by regular US Postal Service.

In Cayey, Puerto Rico, this April 17, 2013.

/s/Miram A. Murphy Lightbourn
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